

IN THE UNITED STATES ARMY  
FIRST JUDICIAL CIRCUIT

UNITED STATES	)	
	)	
v.	)	<b>DEFENSE REQUEST FOR</b>
	)	<b>SEARCH TERMS OF</b>
	)	<b>RELEVANT COMPUTERS</b>
MANNING, Bradley E., PFC	)	
U.S. Army, (b) (6)	)	
Headquarters and Headquarters Company, U.S.	)	
Army Garrison, Joint Base Myer-Henderson Hall,	)	DATED: 30 March 2012
Fort Myer, VA 22211	)	

1. The Defense, in consultation with its computer forensic experts, requests the following additional search terms<sup>1</sup>:

- a) M-IRC Chat<sup>2</sup>
- b) Wget
- c) Internet Download Manager
- d) Virtual DJ
- e) Free YouTube Downloader
- f) VLC Media Player
- g) UMPlayer
- h) UTorrent
- i) IrfanView
- j) Paint.NET
- k) GEOTRANS
- l) Grid Extractor
- m) Google Earth
- n) Picasa
- o) XnView
- p) GIMP
- q) ubuntu
- r) Skype
- s) Any-Video-Converter
- t) RoboForm

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<sup>1</sup> The Defense incorporate the Court's Order to search for Wget, M-IRC Chat, Google Earth, movies, games, and music. By submitting this list, the Defense does not waive its request for a more detailed search as referenced in the Defense Renewal of Motion to Compel Discovery of Computers also dated 30 March 2012. The Defense also does not concede that this limited search complies with either R.C.M. 701(a)(2) or R.C.M. 701(a)(6).

<sup>2</sup> The Defense requests that the Government provide the software version of each identified program. For instance, M-IRC Chat, if there are multiple versions of this single program on the various computers, the Defense requests that the Government list each version found. A specific version of software may have been authorized on the DCGS-A, while newer versions were not. Thus, the Defense needs the exact version found during the Government's review.

- u) BitTorrent
- v) Applian FLV Media Player
- w) Yahoo Messenger
- x) Windows Live Messenger
- y) AIMP
- z) Pidgin
- aa) Digsby
- bb) Thunderbird
- cc) iTunes
- dd) Songbird
- ee) Spotify
- ff) Winamp
- gg) Google Talk
- hh) RealPlayer
- ii) Media Player Classic
- jj) Foxit Reader

2. The point of contact for this memorandum is the undersigned at (b) (6) or by e-mail at (b) (6)

Respectfully submitted,

DAVID EDWARD COOMBS  
Civilian Defense Counsel